

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
(Boston Division)

SHANA COTTONE,
Plaintiff

v.

CITY OF BOSTON, by and Through
Its Treasurer, Ashley Groffenberger; and
MICHELLE WU,
Defendants.

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C.A. No. 1:24-cv-13233-GAO

**PLAINTIFF'S OPPOSITION TO DEFENDANT CITY OF BOSTON'S MOTION TO
DISMISS COUNTS I-IV OF THE AMENDED COMPLAINT**

Now comes Shana Cottone ("Cottone"), the plaintiff in the above-captioned matter, by and through her attorney, and hereby opposes Defendant City of Boston's Motion to Dismiss Counts I-IV of the Amended Complaint (ECF No. 19).

As grounds for her opposition, Cottone relies on her memorandum of law filed herewith and incorporated by reference herein.

Respectfully Submitted by:

Plaintiff
SHANA COTTONE
By Her Attorney,

/s/Mark P. Gagliardi
Mark P. Gagliardi (MA BBO#: 657622)

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Date: August 11, 2025

CERTIFICATION OF SERVICE

I hereby certify that on this 11th day of August 2025, I filed electronically this document with the ECF system of the United States District Court for the District of Rhode Island and, therefore, all counsel-of-record have received notice electronically.

/s/Mark P. Gagliardi
Mark P. Gagliardi